

**Federal Defenders  
OF NEW YORK, INC.**

Southern District  
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October 19, 2020

**BY ECF**

The Honorable Judge Paul A. Engelmayer  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, NY 10007

**RE: United States v. Jose Dellon, aka Jose Vellon**  
**20 Cr. 474 (PAE)**

Honorable Judge Engelmayer:

I write to request a modification to Jose Vellon's bail conditions in the above-captioned case. Specifically, the defense moves the Court to replace the condition of home detention enforced with electronic monitoring with a curfew to be set by pretrial services. Pretrial services consents to the defense's request; the Government defers to pretrial services.

On July 28, 2020, Mr. Vellon was presented in Magistrate Court. The following bail conditions were set and subsequently met:

\$50,000 personal recognizance bond to be co-signed by two financially responsible persons; travel limited to the SDNY and EDNY; surrender all travel documents with no new applications; pretrial supervision as directed by pretrial services; home detention enforced by electronic monitoring; seek/maintain employment; and no possession of a firearm/destructive device/other weapon.

Doc. No. 5.

To date, Mr. Vellon has complied with all pretrial release conditions. Since Mr. Vellon's presentment in July, he has secured employment and provided verification of employment to pretrial services. In addition to leaving home for work, Mr. Vellon will soon have to attend a mandatory program in person. He will also have to begin reporting to parole in person imminently. Given these various commitments, pretrial services has expressed that home detention is no longer appropriate for Mr. Vellon.

Accordingly, Mr. Vellon respectfully requests that the Court modify his bail conditions to replace home detention secured by electronic monitoring with a curfew to be set by pretrial services. Pretrial services consents to this request and the Government defers to pretrial.

Respectfully submitted,

/s/  
Marne Lenox  
Assistant Federal Defender  
(212) 417-8721

**GRANTED.** The Clerk of Court is requested to terminate the motion at Dkt. No. 21.

10/19/2020

SO ORDERED.



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PAUL A. ENGELMAYER  
United States District Judge

cc: Sam Rothschild, Assistant U.S. Attorney (by ECF)  
Bernisa Mejia, Pre-Trial Services Officer (by email)